U.S. Environmental Protection Agency Region 9 FY17 Small Public Drinking Water System Action Plan

Introduction

Many of Region 9's disadvantaged communities are served by small public drinking water systems (PWSs) lacking sufficient capacity to assure consistent compliance with the Safe Drinking Water Act (SDWA). To underscore the challenge, of the Region's 4,210 community PWSs serving 52.3 million people, approximately 94% (3,940) are small systems (no more than 10,000 customers) serving 3.8 million people. This Small Public Drinking Water System Action Plan (Plan) aims to address the critical need and urgency to improve the safety of public drinking water supplied to residents, schoolchildren and tribal members in these communities, and builds on the ongoing efforts of EPA's Environmental Justice 2020 Action Agenda and draft national Drinking Water Action Plan. Specifically, the Plan focuses on reducing exposure to two contaminants with long-term health effects: arsenic and lead. Exceedances of the federal standard for arsenic, found in the drinking water of many parts of our southwestern states and tribes, represent the number one chronic health-based SDWA violation in the Region, and strengthening protection against lead in drinking water is an EPA national priority.

The four objectives of the Plan are:

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard

OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply

OBJECTIVE III: Improve Access to Safe Drinking Water in Schools

OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

To achieve sustainable results, Region 9 will enhance oversight of states, refine direct enforcement, work with primacy agencies and tribes to provide financial incentives and technical assistance, and engage regulatory partners and stakeholders. Outreach efforts are an integral part of every objective's performance measures.

This Plan uses reported data that is current as of August 2016 as the benchmark to track progress. Appendix I contains summaries of the relevant arsenic data; Appendix II contains summaries of the relevant lead data. The Region will update the Appendices as data from each new reporting cycle become available. The Region will also conduct a mid-year review to assess the effectiveness of the Plan and make adjustments as appropriate.

¹ As of 2016, the respective national and Region 9 compliance rates with health-based drinking water standards are: 91.3% and 97.6% for all PWSs; 89.8% and 88.7% for small PWSs (systems with no more than 10,000 customers); and 89.8% and 87.7% for very small PWSs (systems with no more than 3,300 customers).

² These numbers change over time due to consolidations, closures, and new systems coming on line.

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard

Naturally occurring arsenic appears in many drinking water systems in Region 9. Drinking high levels of arsenic over many years can increase the chance of lung, bladder and skin cancers, heart disease, and neurological damage. On January 22, 2001, EPA reduced the Maximum Contaminant Level (MCL) for arsenic from 50 parts per billion (ppb) to 10 ppb. To address the particular challenges faced by small systems, EPA made available compliance extensions of up to 14 years through an exemption process, which ended on January 23, 2015.

In January 2015, arsenic violations were found at 242 or 6.1% of the Region's small systems in Arizona, California, Nevada, Navajo Nation (collectively "primacy states"), and tribes under EPA's SDWA direct implementation authority ("DI tribes"). In response, Region 9 initiated an enforcement effort to place small systems under an enforcement order with an enforceable "return to compliance" schedule. For arsenic MCL violations, "return to compliance" ("RTC") means the system has been in compliance with the arsenic running annual average for at least four consecutive quarters.

Our initial effort yielded measurable results. As summarized in Figure 1 below, between January 2015 and August 2016, 105 systems (58% of the total noncompliant systems at the time) were on a compliance pathway, and 78 systems (30% of the total noncompliant systems) returned to compliance. The universe of small systems with arsenic issues is not static, however. Within that same period of time, 19 systems joined the noncompliant list. Cases addressed during this initial phase tended to involve systems that could more readily meet their compliance obligations. Resolution of new cases is expected to be more difficult and time-consuming due to technical or financial constraints on the part of the systems.

Figure 1: Compliance Status of Small Systems for Arsenic MCL:3

Date	AZ CA NV		NV	Navajo	DI Tribes	Total
1/2015: Systems in						
n <i>oncompliance</i>	20	194	10	8	10	242
8/2016: Systems in						
noncompliance (new since						
1/2015)	14 (1 new)	146 (15 new)	8 (1 new)	3	10 (2 new)	181 (19 new)
8/2016: Systems on						
enforceable compliance						
schedule but not yet RTC	12	82	5	3	3	105

In FY17, Region 9 will continue to use enforcement as a key tool to drive arsenic reduction for the majority of noncompliant small systems, supplementing it with non-enforcement options (such as technical and financial assistance), especially for systems that lack sufficient resources or technical knowledge to achieve compliance.

³ See Appendix I, Attachment A: Small Systems in Noncompliance with Arsenic MCL by States as of August 2016.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 1: Strengthen EPA oversight of primacy agencies' enforcement responses and direct actions to accelerate small systems' arsenic compliance.

Action 1A: Track and facilitate primacy agencies' enforcement responses to arsenic violations on a system-by-system basis to drive results. (Quarterly or more with AZ, CA, NV & Navajo Nat.)

- Use a detailed, action-forcing tracking system and regularly scheduled meetings with primacy agencies to:
 - ✓ Prioritize enforcement action based on the systems: (1) size and vulnerabilities of populations served, especially schools and daycare facilities; (2) noncompliance duration; (3) arsenic exceedance level; and (4) overall profile of compliance, especially with health-based standards.
 - ✓ Confirm actions to put systems on an enforceable compliance schedule.
 - ✓ Review measures for interim sources of drinking water, especially for schools and daycare facilities.
 - ✓ Verify systems' adherence to required measures and milestones in the prior review period.
 - ✓ Explore non-enforcement tools to reduce arsenic exceedances.

Action 1B: Initiate direct EPA enforcement response to compel compliance. (On-going)

- ✓ <u>For DI Tribes</u>: Prioritize enforcement actions based on the systems: (1) size and vulnerabilities of populations served, especially schools and daycare facilities; (2) noncompliance duration; (3) arsenic exceedance level; and (4) overall profile of compliance, especially with health-based standards.
- ✓ <u>For Primacy States</u>: Prioritize actions based on a primacy agency's referral or failure to put a system on an enforceable compliance schedule.

Action 1C: Enhance monitoring of compliance with active EPA orders.4

- Conduct regularly scheduled meetings with the system representative to track and ensure compliance with required corrective measures and milestones. (Quarterly or more)
- If the system fails to meet the order's requirements, take additional appropriate enforcement action. (Ongoing)

STRATEGY 2: Use non-enforcement tools to reduce arsenic exposure, especially where enforcement may not be the most effective avenue to achieve compliance.

Action 2A: Encourage use of the Drinking Water State Revolving Fund (DWSRF) for long-term arsenic solutions, such as new water source, new treatment capacity, or consolidation with a larger PWS.

- Identify and track progress of systems slated to address arsenic through DWSRF-funded long-term solutions (Semiannual updates for list of nine CA small systems;⁵ list for other states being compiled.)
- Work with primacy agencies to amplify innovative approaches to incentivize or require consolidation of systems that offer sustainable solutions to small communities' persistent exposure to arsenic in their drinking water.

MEASURES

- Increase small systems' "on an enforceable compliance schedule" rate from the current 55% to 80% by end of FY17.* (*This measure takes into account the dynamic nature of small systems' arsenic performance over time and the limitation of enforcement in some instances.)
- Increase non-compliant system's "return to compliance" rate from the current 30% to 45% through FY17 and FY18 with a steady downward noncompliance trend.* (*This measure takes into account the varying "return to compliance" deadlines under different orders.)
- Conduct public outreach for all EPA enforcement actions.
- Conduct 2 outreach events to amplify innovations in arsenic reduction for overburdened communities.

⁴ See **Appendix I**, **Attachment B**: List of Active EPA Orders, Milestones and Deadlines.

⁵ See **Appendix I**, **Attachment C**: List of Drinking Water State Revolving Fund Projects in California.

OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply

Exposure to lead from drinking water can have significant adverse impacts on human health. In children, low levels of exposure have been linked to damage to the nervous system, learning disabilities, impaired growth and hearing, and impaired blood cell formation and function. Under EPA's Lead and Copper Rule (LCR), if there are **action level exceedances or ALEs** for lead (i.e., when lead concentrations exceed an action level of 15 ppb in more than 10 percent of customer taps sampled), the system must undertake a number of additional actions. These actions could include notifying the public, optimizing corrosion control treatment, conducting additional monitoring, and replacing portions of lead service lines controlled by the utility. The lead action level is not the same as an MCL.

In Region 9, the number of small PWSs with ALEs for lead are relatively low compared to many parts of the country, largely due to the common use of naturally less corrosive groundwater sources in the western U.S. Based on the most recent 90th percentile reporting, 27 of the 4,210 small community systems in Region 9 have <u>current</u> lead ALEs (Figure 2). In FY17, Region 9 will enhance engagement with primacy agencies to bring these systems to below the action level and provide training directly to states, utilities and technical assistance providers to improve corrosion control treatment.

In addition, as a proactive measure, Region 9 will strengthen oversight by conducting targeted review of the primacy agencies' files of 19 small systems that, though currently below the lead action level, have had <u>multiple historical</u> ALEs. These systems are located in Arizona and California. While primacy agencies may have taken actions to address these historical ALEs, file reviews⁶ will allow us to identify and assess the adequacy of those actions to prevent future incidents of ALEs.

Figure 2: Status of Action Level Exceedances for Lead for Small Community, School and Tribal Systems*

State	Current ALEs	Multiple Historical ALEs	Current ALEs	Multiple Historical	Current ALEs
	(community PWSs)	(community PWSs)	(school PWSs)	ALEs (school PWSs)	(Tribal PWSs)
AZ	12	12	4	4	
CA	10	7	7	9	
NV	1	0	1	0	
CNMI	4	0	0	0	
Total	27	19	12	13	5

^{*} School PWSs with lead ALEs will be addressed in Objective III, Improve Access to Safe Drinking Water in Schools; tribal PWSs with lead ALEs will be addressed in Objective IV, Improve Access to Safe Drinking Water in Tribal Communities.

⁶ See **Appendix II, Attachment A**: Region 9 Public Drinking Water System File Review Protocol.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 3: Enhance oversight of primacy agencies and small systems with current or historical lead ALEs to ensure timely and proper implementation of Lead and Copper Rule requirements.

Action 3A. Engage with primacy agencies to address 27 small systems (12 in AZ, 10 in CA, 1 in NV and 4 in Northern Mariana Islands)⁷ with <u>current lead ALEs</u>. (Excludes 12 school PWSs, addressed in Objective III.)

- Develop semiannual status report of the 27 small systems. (March & September, 2017)
- Increase primary agency oversight, require enhanced reporting, and provide technical assistance to help primacy agencies remedy ALEs.

Action 3B. Review primacy agency files of 19 small systems (12 in AZ and 7 in CA) with <u>multiple historical</u> lead ALEs⁸ (not current ALEs) to verify proper and timely implementation of LCR requirements. (Excludes 13 school PWSs, addressed in Objective III.)

- Conduct file review to determine if a primacy agency is making proper LCR compliance determinations for systems under its supervision and reporting accurate water system inventory and compliance data to EPA.
- Prepare written findings and recommendations based on file review. (March 2017 for AZ; June 2017 for CA)
- Work with primacy agencies on a program improvement plan to address findings and recommendations.

STRATEGY 4: Provide corrosion control treatment assistance to small PWSs and regulatory agencies in need.

Action 4A. Convene Corrosion Control Treatment Training

- Identify agencies or public water systems struggling with corrosion control treatment to participate in training. (November 2016)
- Convene training for states, technical assistance providers, and public water systems on the development and review of corrosion control treatment plans. (November 2016)

MEASURES

- Complete semiannual status report on the 27 small PWSs with <u>current</u> lead ALEs and bring the systems' lead ALEs to below the action level.
- Complete file review reports on the 19 small PWSs with <u>multiple historical</u> lead ALEs and engage with primacy agencies to act on recommended improvements.
- Convene 2 corrosion control training workshops, with attendance by priority systems.
- Conduct public/media outreach for systems that achieve LCR compliance.

OBJECTIVE III: Improve Access to Safe Drinking Water in Schools

Schools (including daycare facilities) may operate their own drinking water systems and be regulated as PWSs by the SDWA (school PWSs); or they may only be customers of PWSs and thus not directly subject to the SDWA requirements. The great majority of schools receive their drinking water from a regulated PWS rather than having their own sources of drinking water. Of the 632 small school PWSs in Region 9, 22 in California and on tribal lands have arsenic exceedances, while 12 in Arizona, California, and Nevada have current lead ALEs (Figure 2).

With respect to arsenic, we will address the 22 school PWSs and PWSs that supply water to schools with arsenic exceedances via enforcement and non-enforcement tools, as appropriate.

⁷ See **Appendix II**, **Attachment B**, List of state and tribal PWSs with current ALEs

⁸ See Appendix II, Attachment C: List of Small PWSs with Historical Lead ALEs.

With respect to lead, for the 12 school PWSs with current ALEs, we will ensure provision of drinking water that meets the federal lead requirements via oversight, technical assistance, and funding for alternative water if necessary. In addition, for reasons articulated in Objective II, we will strengthen oversight by conducting targeted reviews of primary agencies' files of reviews on 13 school PWSs in Arizona and California with <u>multiple historical</u> (not current) lead ALEs to ensure proper and timely implementation of the LCR requirements and prevent future LCR issues.

For schools receiving their drinking water from a PWS, sampling for lead in water from corroded pipes and fixtures is not required under the LCR. In California and Nevada, which are establishing programs for testing and remediation of lead in school drinking water, we will work with their primacy agencies and utilities to support adequate tap sampling and respond to lead ALEs. In DI tribes, we will work closely with the tribal authorities and utilities to commence and implement a school lead sampling project and address any detected lead issues.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 5: Reduce children's exposure to arsenic in drinking water supplied by school PWSs or other small systems through enhanced oversight, enforcement, technical assistance, and funding.

Action 5A. Return School PWSs with arsenic exceedances¹⁰ to compliance through enforcement tools as discussed in Objective I.

Action 5B. Leverage resources to provide compliance assistance to school PWSs with arsenic exceedances.

- Target National Technical Assistance grant funds to assist school PWSs with arsenic violations. (December 2016)
- Work with primacy agencies to negotiate the terms of technical assistance provider work plans that focus on returning school PWSs to compliance. (January 2017)
- Leverage and target Drinking Water State Revolving Funds to bring school PWSs with arsenic violations back into compliance. (September 2017)

Action 5C. Return community water suppliers of schools with arsenic exceedances to compliance through both enforcement and non-enforcement tools as discussed in Objective I.

STRATEGY 6: Reduce children's exposure to lead in drinking water by ensuring provision of alternative water, enhancing oversight and supporting tap sampling at schools served by PWSs.

Action 6A. Ensure that the 12 School PWSs (4 in AZ, 7 in CA and 1 in NV) with <u>current</u> lead ALEs¹¹ receive interim provision of alternative water.

- Determine whether interim alternative drinking water is provided to the 12 School PWSs with current lead ALEs. (Ongoing)
- Engage schools to provide alternative drinking water until the PWSs meet the LCR requirements. (Ongoing)

Action 6B. Conduct file reviews of the 13 School PWSs (4 in AZ and 9 in CA) with <u>multiple historical</u> (not current) ALEs¹² and verify proper implementation by primacy agencies of LCR requirements.

- Conduct file review to determine if a primacy agency is making proper LCR compliance determinations for systems under its supervision and reporting accurate water system inventory and compliance data to EPA
- Prepare written findings and recommendations based on file review. (March 2017 for AZ; June 2017 for CA)
- Work with primacy agencies on a program improvement plan to address findings and recommendations.

⁹ The current LCR targets single-family residences that are likely to have the highest risk for lead exposure.

¹⁰ See **Appendix I**, **Attachment A**, for list of School PWSs with arsenic violations (in bold at the end of each table).

¹¹ See **Appendix II**, **Attachment B**, for list of school PWSs with current ALEs (in bold at the end of each table).

¹² See **Appendix II, Attachment C**, for list of school PWSs with historical lead ALEs (in bold at the end of each table).

Action 6C. Identify and address lead in school taps and fountains served by PWSs in primacy states.

- California: Monitor state efforts under the school tap sample initiative and provide technical support for tap sampling of public schools. (Ongoing)
- **Nevada:** Oversee Nevada's testing for lead in 408 elementary and pre-K facilities via EPA's multi-purpose, multi-year grant (\$89K) under the school tap sampling initiative. (Ongoing)

Action 6D. Identify and address lead in school taps and fountains served by PWSs in DI tribes. (See Objective IV for other actions to address safe drinking water in tribal communities)

- Work with tribes to identify candidate schools for lead sampling, from approximately 150 that are served by DI regulated PWSs, based on age of facility and existence of prior sampling. (December 2016)
- Develop a lead sampling strategy. (March 2017)
- Develop a notification and quality assurance plan for PWSs and tribal schools. (May 2017)
- Conduct lead sampling in schools in coordination with tribal utilities by leveraging available resources (e.g., EPA's circuit rider). (Begin July 2017)
- Conduct additional oversight and engagement with utilities and schools where results are above the lead
 action level, including work with the tribe/utility/school to implement steps such as replacement of leadcontaining materials in school distribution systems (fixtures, valves, internal plumbing), installation of
 treatment, finding/providing alternative water, and/or providing education/training. (Q4 of FY17 and FY18)

MEASURES

- All school PWSs with arsenic exceedances as of August 2016 either are on an enforceable compliance schedule or returned to compliance by end of FY17.
- Interim alternative drinking water is provided to all school PWSs with current lead ALEs, where needed.
- Complete file review reports for 13 school PWSs with multiple historical ALEs and engage with primary agencies to act on recommended improvements.
- Tap sampling project in tribal schools served by PWSs is in the implementation phase.
- One press event each for CA, NV and tribes to highlight tap sampling and infrastructure work in schools.

OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

Region 9 directly regulates 321 tribal PWSs serving a population of about 477,000. Of the 321 systems, 97% are small systems with 90% classified as very small systems (serving not more than 3,300 people). Region 9 receives two main sources of funding for tribal drinking water management and assistance, with the funding amounts varying from year-to-year. In FY16, the Region awarded close to \$17 million to provide direct technical and compliance assistance to tribal utilities (e.g., technical expertise services), and \$7.5 million for drinking water infrastructure funding (tribal set-aside) to support tribal projects such as water engineering studies, new wells, pipelines, and treatment facilities.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 7: Protect tribal communities from exposure to arsenic and lead in drinking water through enhanced oversight, enforcement, funding, and technical assistance.

Action 7A. Return the 10 tribal systems with current arsenic MCL violations¹³ to compliance.

 Return the 10 non-compliant tribal systems (including 2 school PWSs) to compliance or put them on a compliance path with the arsenic MCL using a combination of Region 9 oversight, EPA-funded technical assistance, Drinking Water Tribal Set-Aside infrastructure funds and enforcement. (September 2017)

Action 7B. Ensure the 5 tribal systems with current lead ALEs¹⁴ take timely action to address ALEs by reducing lead in their water supply and, if necessary, conduct EPA-approved optimal corrosion control treatment. (September 2017)

Action 7C. Review 289 site-sampling plans for adequacy and ability to ensure that each system has updated EPA-approved site sampling plans so that data collection is adequate to assess system compliance with national drinking water standards.

 Work with EPA-funded circuit rider and tribal utilities to ensure site-sampling plans are current and compliant with the LCR, Revised Total Coliform Rule, and Disinfection Byproducts Rules. (50% of plans approved by February 2017; 90% of plans approved by September 2017)

MEASURES

- The 10 identified tribal systems with arsenic exceedances are on a compliance pathway (under an enforceable compliance schedule or a consolidation/new technology schedule)or returned to compliance by end of FY17.
- The 5 identified tribal systems with lead ALEs meet the LCR requirements by end of FY17.
- 90% of tribal system sampling plans (289) are approved by end of FY17.
- Public outreach for all EPA enforcement actions.

¹³ See **Appendix I,** Attachment **A**, for a list of tribal and tribal school PWSs not in compliance for arsenic (in bold at the end of each table).

¹⁴ See **Appendix II, Attachment B**, for a list of tribal systems with current lead ALEs.

Appendix I

Attachment A Small Systems in Noncompliance with Arsenic Maximum Contaminant Level (MCL) listed by State as of August 2016

Arizona Water Systems in Noncompliance with Arsenic

(Based on information reported by the state through June 2016)
MCL for Arsenic: 10 parts per billion (ppb)

#	PWS ID	PWS Name	County	Pop	Arsenic RAA ¹ (ppb)	Under Order ² (Y/N)	Status
1	AZ0402033	City of Tombstone	Cochise	887	10	Y	System is reworking its blending plan to address the arsenic MCL exceedances. New blending plan due to state by November 2017. Anticipated return to compliance date is 12/31/17.
2	AZ0404029	Jakes Corner Water System	Gila	35	12	Y	System is planning to install treatment. Application fee for Approval to Construct (ATC) to state is due by 11/10/16.
3	AZ0407671	Peekaboo Water Coop	Maricopa	100	9	Y	The system's arsenic levels are currently below the arsenic MCL.
4	AZ0407677	Valley View Water Company	Maricopa	60	10	Υ	Anticipated return to compliance date is 5/31/17.
5	AZ0408035	Truxton Canyon Water Company	Mohave	2,126	13	Y	System received SRF funding and completed its treatment construction. Anticipated return to compliance date is 1/31/17.
6	AZ0408149	White Hills Water Company Unit 1	Mohave	46	9	N	System is currently meeting the arsenic RAA. Awaiting further sampling results to confirm compliance. State assigned case officer to oversee the system. Anticipated return to compliance date is 12/31/17.
7	AZ0411557	New Saddleback Vista DWID	Pinal	129	11	Υ	Arsenic treatment has been installed. Waiting for the System's RAA to be below the MCL. Anticipated return to compliance date is 12/31/17.
8	AZ0413038	Lake Verde Water Company	Yavapai	125	10	Y	System is on the SRF project list for funding. System is currently under construction for arsenic treatment. Estimated completion date for construction is 2/7/17. Anticipated return to compliance date is 4/30/18.

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¹ The Running Annual Average (RAA) is the average of analytical results for samples taken during the previous four calendar quarters and is used to determine compliance with the arsenic MCL of 10 ppb.

² Unless stated otherwise, the state primacy agency issued the enforcement order.

(Based on information reported by the state through June 2016)

MCL for Arsenic: 10 parts per billion (ppb)

#	PWS ID	PWS Name	County	Рор	Arsenic RAA ¹ (ppb)	Under Order ² (Y/N)	Status
9	AZ0413425	Rio Verde RV Park	Yavapai	213	48	Y	State recently revised the order. State to reclassify this system from a CWS to TNC.
10	AZ0414018	TACNA Water Management Company	Yuma	240	24	N	State is drafting a compliance order for the system's new owners. State is working with system to develop technical options. The system can consolidate with Mohawk Utility or install treatment.
11	AZ0411100	Thunderbird Farms DWID	Pinal	1,600	10	Y	On track to meet 10/30/16 deadline for completion of construction (treatment). Anticipated return to compliance date is June 2017.
12	AZ0414098	Sierra Pacific Mobile Man	Yuma	816	23	Y	Construction is substantially complete. Waiting for the lab analytical results and system's RAA to be below the MCL. Anticipated return to compliance date is 12/31/17.
13	AZ0415023	Wenden DWID	La Paz	750	11	Y	USDA funding for treatment was approved. Anticipated construction completion date of treatment system is June 2017. Alternative water may be served in the interim.
14	AZ0415038	Bouse Worley Water System	La Paz	190	10	Υ	A private system that has raised its utility rates. State is working with system to develop technical options, including treatment.
	Total	14		7,317			

California Water Systems in Noncompliance with Arsenic

(Based on information reported by the state through June 2016)
MCL for Arsenic: 10 ppb

Arsenic Under # PWS ID Order³ **PWS Name** County Pop RAA Status (ppb) (Y/N) 1 CA0600008 Colusa Co. W.D. #1 -Colusa 500 24 Ν Anticipated return to Grimes compliance date is unknown. Bottled water or hauled water is being provided to customers.

 $^{^{\}rm 3}$ Unless stated otherwise, the state primacy agency issued the enforcement order.

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
2	CA0707602	Beacon West	Contra Costa	45	27	N	Anticipated return to compliance by December 2016.
3	CA0707615	Doubletree Ranch HOA	Contra Costa	49	21.5	Y	Anticipated return to compliance by July 2017.
4	CA0900102	Gold Beach Park	El Dorado	100	12	Y	Anticipated return to compliance date is unknown. System not complying with compliance order.
5	CA1000053	Lanare CSD	Fresno	400	13; 19.3	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
6	CA1000071	Lakeview Improvement Assoc.	Fresno	64	27.5; 19.3	Y	Anticipated return to compliance by July 2017.
7	CA1000072	Shaver Lake Pt. No. 2	Fresno	210	4.5; 38; 28.8	N	Anticipated return to compliance by December 2016.
8	CA1000369	Zonneveld Dairy	Fresno	141	17.6; 9.1	N	Anticipated return to compliance by September 2016. Bottled water or hauled water is being provided to customers.
9	CA1000584	True Organic Products	Fresno	42	15.5	Y	Anticipated return to compliance by December 2016.
10	CA1000602	Baker Commodities	Fresno	60	6.3	N	Anticipated return to compliance by December 2016. System is currently serving MCL-compliant water.
11	CA1000604	Johann Dairy	Fresno	60	29	Y	Anticipated return to compliance by April 2019.
12	CA1009051	Cantua Creek Vineyards	Fresno	50	31.3	Υ	Anticipated return to compliance by July 2017. Bottled water or hauled water is being provided to customers.

#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
13	CA1010039	Caruthers CSD	Fresno	2,103	10; 10.7	N	Anticipated return to compliance by March 2018.
14	CA1400036	Keeler CSD	Inyo	180	65	Y	Anticipated return to compliance by July 2018.
15	CA1500378	Maher Mutual Water Company	Kern	192	16	Y	Anticipated return to compliance by June 2018.
16	CA1500424	Land of Promise Mutual Water Association	Kern	190	17	Y	Anticipated return to compliance by May 2018.
17	CA1500426	Rosa Villa Apartments	Kern	47	10	N	Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water. System is receiving SRF funding.*
18	CA1500436	Hungry Gulch Water System	Kern	33	77	Y	Anticipated return to compliance by April 2018.
19	CA1500442	Sunset Apartment Water System	Kern	37	42	Υ	Anticipated return to compliance by August 2018.
20	CA1500449	Fourth Street Water System	Kern	56	18	N	Anticipated return to compliance by December 2016.
21	CA1500455	William Fisher Memorial Water Company	Kern	53	22	N	Anticipated return to compliance date is unknown.
22	CA1500458	RS Mutual Water Company	Kern	67	10	N	Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
23	CA1500461	Fountain Trailer Park Water	Kern	68	89	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
24	CA1500485	Antelope Valley Mobile Estates	Kern	49	8	N	Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water. System is receiving SRF funding.*

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
25	CA1500493	El Adobe Property Owners Association, Inc.	Kern	200	20	N	Anticipated return to compliance by June 2018.
26	CA1500521	Boulder Canyon Water Association	Kern	28	19	Y	Anticipated return to compliance by April 2018.
27	CA1500525	Lakeview Ranchos Mutual Water	Kern	120	43	Υ	Anticipated return to compliance by March 2018.
28	CA1500571	Lucky 18 on Rosamond, LLC	Kern	147	30	N	Anticipated return to compliance date is unknown. System is receiving SRF funding.*
29	CA1500585	Oasis Prop Owner Assoc.	Kern	100	11	N	Anticipated return to compliance date is unknown.
30	CA1502383	Nord Road Water Association	Kern	39	13	Y	Anticipated return to compliance by June 2018.
31	CA1502569	First Mutual Water System	Kern	35	30	Υ	Anticipated return to compliance by May 2018. System is receiving SRF funding.*
32	CA1502620	Pond MWC	Kern	48	14	N	Anticipated return to compliance by December 2016.
33	CA1502724	Quail Valley Water District-Eastside System	Kern	60	88	Υ	Anticipated return to compliance by April 2018.
34	CA1502744	60th Street Association Water System	Kern	44	11	N	Anticipated return to compliance date is unknown. System is receiving SRF funding.*
35	CA1510001	Arvin CSD	Kern	11,847	31	Y	Anticipated return to compliance by March 2019. Bottled water or hauled water is being provided to customers.
36	CA1510002	Boron Community Services District	Kern	2,500	38	Υ	Anticipated return to compliance by March 2018.
37	CA1510012	Lamont PUD	Kern	13,296	10.1	N	Anticipated return to compliance by December 2016. System is currently serving MCL-compliant water.
38	CA1510016	Rand Communities Water District	Kern	450	19	Υ	Anticipated return to compliance by March 2018.
39	CA1510024	Greenfield CWD	Kern	6,500	11	Υ	Anticipated return to compliance by June 2018.

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
40	CA1510052	North Edwards Water	Kern	600	32	N	Anticipated return to
		District					compliance by May 2018.
41	CA1600050	Central Valley Meat	Kings	280	36	Y	Anticipated return to
							compliance by January 2019.
							Bottled water or hauled water
43	CA1COOCO1	Kin - Mark Drawiin -	IZ:	 	 	Y	is being provided to customers.
42	CA1600601	Kings Waste Recycling	Kings	45	91	1	Anticipated return to
		Authority					compliance by January 2019. Bottled water or hauled water
							is being provided to customers.
43	CA1600605	Baker Commodities	Kings	47	28	Y	Anticipated return to
45	CATOOOGG	baker commodities	Killgs	*′	20	'	compliance by January 2018.
							Bottled water or hauled water
							is being provided to customers.
44	CA1610009	Kettleman City CSD	Kings	1,499	15	N	Anticipated return to
	C/(1010003	Receivement City Cob	1 11183	1,133		''	compliance date is unknown.
45	CA1900038	Lancaster Park Mobile	Los Angeles	53	15	N	Anticipated return to
		Home Park				'	compliance by October 2016.
46	CA1900100	Mettler Valley Mutual	Los Angeles	100	13	N	Anticipated return to
		,					compliance by October 2016.
47	CA1900520	The Village Mobile	Los Angeles	70	45	N	Anticipated return to
		Home Park					compliance by October 2016.
48	CA1900785	Mitchell's Avenue	Los Angeles	26	21	N	Anticipated return to
		Mobile Home Park					compliance by July 2017.
49	CA1900961	Winterhaven Mobile	Los Angeles	40	51	N	Anticipated return to
		Estates					compliance by October 2016.
50	CA1910246	Land Projects Mutual	Los Angeles	1,500	12.5;	N	Anticipated return to
		Water Company			14.5;		compliance date is unknown.
					10.82		Referred to EPA for
							enforcement escalation.
51	CA2000506	Sierra Linda	Madera	180	27	Y	Anticipated return to
			<u> </u>				compliance by June 2018.
52	CA2000527	Yosemite Forks Estates	Madera	110	17	Y	Anticipated return to
	010000501		<u> </u>	4-	 		compliance by June 2018.
53	CA2000534	Leisure Acres	Madera	45	8.7	Y	Anticipated return to
							compliance by June 2018.
							System is currently serving MCL-compliant water.
54	CA2000538	Codar Valloy Mutual	Madera	137	17	Y	Anticipated return to
) 4	CA2000558	Cedar Valley Mutual	iviauera	13/	1/	'	compliance by June 2018.
55	CA2000550	MD 6 Lake Shore	Madera	130	79; 97	Y	Anticipated return to
	CA2000330	WID O EURO SHOTE	Madera	130	'3, 3'	'	compliance by June 2018.
							Bottled water or hauled water
							is being provided to year-round
							customers.
56	CA2000551	MD 7 Marina View	Madera	200	13	Y	Anticipated return to
		Heights					compliance by June 2018.

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
57	CA2000552	MD 24 Teaford	Madera	150	16	Υ	Anticipated return to
		Meadows					compliance by June 2018.
58	CA2000561	MD 8 North Fork	Madera	264	13	Υ	Anticipated return to
							compliance by June 2018.
59	CA2000619	Cold Spring Granite	Madera	43	11;	Υ	Anticipated return to
					16.2		compliance by June 2018.
60	CA2000737	MD 42 Still Meadows	Madera	100	18; 14	Υ	Anticipated return to
							compliance by June 2018.
61	CA2000866	Agriland Farming	Madera	190	11.5	Y	Anticipated return to
							compliance by June 2018.
62	CA2010007	Hillview Water Company- Oakhurst/Sierra Lakes	Madera	3,006	12.5	Y	Anticipated return to compliance by July 2018.
63	CA2010012	Hillview Water	Madera	290	21	Υ	Anticipated return to
		Company-Raymond					compliance by July 2018.
64	CA2010801	Valley State Prison	Madera	4,000	9.95;	N	Anticipated return to
					7.8;		compliance date is unknown.
					7.2;		System is currently serving
					3.35		MCL-compliant water.
65	CA2210937	Mariposa County	Mariposa	135	17	Υ	Anticipated return to
		Public Works Dept					compliance by November 2016.
							Bottled water or hauled water
	643466465	E . E . D.II.		1 200	45.75		is being provided to customers.
66	CA2400165	Foster Farms Delhi	Merced	200	15.75	Y	Anticipated return to
67	CA2400170	Feedmill	N. A	1.000	4.7	Y	compliance by February 2018.
6/	CA2400170	Hilmar Cheese	Merced	1,000	4.7	1	Anticipated return to compliance by December 2016.
		Company					System is currently serving
							MCL-compliant water.
68	CA2600622	Sierra East MHP	Mono	50	42; 81	N	Anticipated return to
00	CAZOUOUZZ	Sicila Last Willi	IVIONO	130	72, 01	'	compliance by July 2018.
69	CA2610003	Bridgeport PUD	Mono	3,000	34	Y	Anticipated return to
	0,12010000	J. Hagoporer ob	l Wienie	5,000			compliance by April 2018.
70	CA2700612	Laguna Seca WC	Monterey	162	10.5	Y	Anticipated return to
			,				compliance by March 2018.
71	CA2700702	Prunedale MWC	Monterey	252	10	N	Anticipated return to
			,				compliance date is unknown.
72	CA2700799	Vista Del Toro WS	Monterey	87	20	Υ	Anticipated return to
							compliance by March 2018.
73	CA2701296	Moro Rd. #9 WS	Monterey	210	19	Υ	Anticipated return to
							compliance by March 2018.
74	CA2701959	Tierra Vista MWC	Monterey	57	11	Υ	Anticipated return to
							compliance by March 2018.
75	CA2702009	Laguna Seca Rec WS	Monterey	500	16	Υ	Anticipated return to
							compliance by March 2018.
76	CA2702030	Cypress Community	Monterey	200	16	Υ	Anticipated return to
		Church WS					compliance by March 2018.

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order³ (Y/N)	Status
					''' /	, , ,	Bottled water or hauled water
							is being provided to customers.
77	CA2702051	Corral de Tierra Estates	Monterey	45	76	Υ	Anticipated return to
		WS					compliance by March 2018.
78	CA3210011	Plumas Eureka CSD	Plumas	339	10.4	Υ	Anticipated return to
	010001000					. .	compliance by November 2017.
79	CA3301380	Saint Anthony Trailer	Riverside	300	21	N	Anticipated return to
80	CA3303092	Park Mecca Arco Travel	Riverside	47	27	N	compliance date is unknown. Anticipated return to
80	CA5303092	Center	Riverside	47	2/	IN	compliance by December 2016.
81	CA3303100	Oasis Gardens Water	Riverside	314	11	Υ	Anticipated return to
01	CA3303100	Company	Miversiae	314	**	'	compliance by January 2018.
82	CA3400103	B & W Resort	Sacramento	100	33	Υ	Anticipated return to
						-	compliance by July 2018.
83	CA3400130	Courtland Group	Sacramento	40	10	Υ	Anticipated return to
		·					compliance by July 2018.
							System is currently serving
							MCL-compliant water.
84	CA3400138	Locke Waterworks	Sacramento	65	28	Υ	Anticipated return to
							compliance by July 2018.
85	CA3400149	Rancho Marina MHP	Sacramento	75	33	Υ	Anticipated return to
							compliance by July 2018.
							Bottled water or hauled water
							is being provided to customers.
86	CA3400164	Vieira's Resort	Sacramento	150	25.75;	Υ	Anticipated return to
					28.5		compliance by July 2018.
87	CA3400332	Oxbow Marina	Sacramento	90	27	Υ	Anticipated return to
	010100100	51		25		.,	compliance by July 2018.
88	CA3400433	Edgewater MHP	Sacramento	35	36	Y	Anticipated return to
89	CA3600025	Bar-Len MWC	San	200	17.25	Y	compliance by July 2018. Anticipated return to
89	CA3600025	Bar-Len WWC	Bernardino	200	17.25	Y	compliance by December 2019.
90	CA3600036	Calico Ghost Town	San	1,000	22.25	Y	Anticipated return to
30	CA3600036	Calico Gilost Towii	Bernardino	1,000	22.23	1	compliance by December 2019.
91	CA3600062	Cailier Water System	San	100	48	Υ	Anticipated return to
	0,13000002	Camer Water System	Bernardino	100		·	compliance by December 2019.
92	CA3600196	CSA 70 W-4	San	410	112.5	Υ	Under EPA compliance order.
		Pioneertown	Bernardino			·	Anticipated return to
							compliance by June 2017.
							Bottled water or hauled water
							is being provided to customers.
93	CA3600504	Knoll Enterprises	San	500	28.25	N	Anticipated return to
			Bernardino				compliance by December 2019.
94	CA3601015	Ironwood Camp	San	1,000	31.75	Υ	Anticipated return to
			Bernardino				compliance by December 2019.
95	CA3610705	US Army Fort Irwin	San	16,000	32	N	Anticipated return to
		National Training	Bernardino				compliance by December 2016.
		Center					

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ³ (Y/N)	Status
96	CA3900579	Century Mobile Home Park	San Joaquin	50	14; 14	N	Anticipated return to compliance by December 2016.
97	CA3901213	Avalos, Silvia	San Joaquin	30	13; 13	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
98	CA3901334	BJJ Company LLC	San Joaquin	40	17; 17	N	Anticipated return to compliance date is unknown.
99	CA4000637	Country Hills Estates	San Luis Obispo	81	27	Y	Anticipated return to compliance by July 2018.
100	CA4600019	Sierra Co. W.W.D #1 Calpine	Sierra	225	21.5	Υ	Anticipated return to compliance by November 2016.
101	CA4800561	Snug Harbor Resort	Solano	32	16	Υ	Anticipated return to compliance by April 2018.
102	CA4900575	Loch Haven Mutual Water Company	Sonoma	50	12.5	Υ	Anticipated return to compliance by July 2017.
103	CA4900643	Mount Weske Estates Mutual Water Company	Sonoma	62	50.5	Y	Anticipated return to compliance by July 2017.
104	CA4900676	Sequoia Gardens Mobile Home Park	Sonoma	300	6.2	N	Anticipated return to compliance by December 2016. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
105	CA5000033	Coble's Corner	Stanislaus	50	13	N	Anticipated return to compliance date is unknown.
106	CA5000051	Mobile Plaza Park	Stanislaus	125	12	N	Anticipated return to compliance date is unknown.*
107	CA5000077	Ceres West MHP	Stanislaus	161	20	Υ	Anticipated return to compliance by April 2018.
108	CA5000085	Green Run Mobile Estates	Stanislaus	100	14	N	Anticipated return to compliance date is unknown.*
109	CA5000086	Countryside MH Estates	Stanislaus	60	11	N	Anticipated return to compliance date is unknown.*
110	CA5000218	Country Villa Apts.	Stanislaus	30	22	N	Anticipated return to compliance date is unknown.
111	CA5000308	B&H Manufacturing	Stanislaus	90	8	Υ	Anticipated return to compliance by March 2017. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
112	CA5000389	Monterey Park Tract CSD	Stanislaus	186	32	N	Anticipated return to compliance by September 2016. Bottled water or hauled water is being provided to customers.

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order³ (Y/N)	Status
113	CA5000465	Duarte Nursery	Stanislaus	75	6	N	Anticipated return to compliance date is unknown.
114	CA5000484	United Pallet	Stanislaus	45	12	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
115	CA5000498	Patchetts Ford Mercury	Stanislaus	35	10	N	Anticipated return to compliance date is unknown.
116	CA5000570	Valley Peterbilt	Stanislaus	25	11	Υ	Anticipated return to compliance by January 2018. Bottled water or hauled water is being provided to customers.
117	CA5010008	City of Hughson	Stanislaus	6,082	11	Υ	Anticipated return to compliance by July 2018. System is receiving SRF funding.*
118	CA5010009	Keyes CSD	Stanislaus	4,891	15	N	Anticipated return to compliance by December 2016. System is receiving SRF funding.*
119	CA5100107	Sutter County WWD#1 (Robbins)	Sutter	350	16.5	Υ	Anticipated return to compliance by December 2018.
120	CA5200550	New Orchard MHP	Tehama	100	20.75	N	Anticipated return to compliance by December 2016.
121	CA5201137	Millstream MHP	Tehama	118	20.75	N	Anticipated return to compliance by December 2016.
122	CA5210003	Los Molinos Comm. Services District	Tehama	1,500	10.5	Υ	Anticipated return to compliance by July 2018. System is receiving SRF funding.*
123	CA5403054	PFFJ, LLC	Tulare	87	75; 58	Υ	Anticipated return to compliance by March 2018. Bottled water or hauled water is being provided to customers.
124	CA5410009	Pixley PUD	Tulare	2,793	19	Y	Anticipated return to compliance by June 2018.
125	CA5410024	Richgrove Community Services	Tulare	3,330	7	N	Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
126	CA5410050	Alpaugh JPA	Tulare	1,091	7	Y	Anticipated return to compliance by May 2018. System is currently serving MCL-compliant water.
127	CA5700514	Bogle Winery	Yolo	40	12.5	N	Anticipated return to compliance by January 2017. Bottled water or hauled water is being provided to customers.

#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ppb)	Under Order³ (Y/N)	Status
							LPA planning to issue new compliance order by July 2016.
128	CA5700652	Yolo Fliers Club	Yolo	410	10	N	Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
129	CA5700778	Yolo County Central Landfill	Yolo	40	11	N	Anticipated return to compliance by September 2016.
130	CA5800805	Lake Francis Mutual Water Company	Yuba	27	10.8	N	Anticipated return to compliance date is unknown.
131	CA0900210	Millers Hill School	El Dorado	120	8.9	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
132	CA1502154	Lakeside School	Kern	800	17	N	Anticipated return to compliance by December 2017. Bottled water or hauled water is being provided to customers.
133	CA1502231	Rosamond School Water System	Kern	900	11	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers. System is receiving SRF funding.*
134	CA1600008	Central Union School	Kings	320	13; 11	Y	Anticipated return to compliance by July 2019.
135	CA1600048	Kettleman City Elementary	Kings	350	12.25	Υ	Anticipated return to compliance by January 2019. Bottled water or hauled water is being provided to customers.
136	CA2000150	Liberty High School	Madera	1,340	42	Υ	Anticipated return to compliance by August 2018.
137	CA2000612	North Fork Union School	Madera	350	13	Y	Anticipated return to compliance by June 2018.
138	CA2000785	Valley Teen Ranch	Madera	50	54	Y	Anticipated return to compliance by June 2018. Bottled water or hauled water is being provided to customers.
139	CA2701221	Washington School	Monterey	250	25	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
140	CA2702550	Grange Hall WS	Monterey	25	57	Y	Anticipated return to compliance by March 2018. Bottled water or hauled water is being provided to customers.

(Based on information reported by the state through June 2016)

MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order³ (Y/N)	Status
141	CA3701010	Warner Unified School District	San Diego	250	10.6	Y	Anticipated return to compliance by March 2017. Bottled water or hauled water is being provided to customers.
142	CA3901169	MSUD-Nile Garden School	San Joaquin	804	23; 23	N	Anticipated return to compliance by December 2016.
143	CA4000774	Pleasant Valley Elementary	San Luis Obispo	150	16	N	Anticipated return to compliance by July 2017. Bottled water or hauled water is being provided to customers.
144	CA5000273	Gratton School	Stanislaus	110	13	N	Anticipated return to compliance date is unknown.
145	CA5100145	Winship Elementary School	Sutter	38	15.5	N	Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
146	CA5100149	Barry Elementary School	Sutter	560	14.9	Y	Anticipated return to compliance by May 2018. Bottled water or hauled water is being provided to customers.
	Total	146		109,106			

^{*} See Attachment C (Drinking Water State Revolving Fund Arsenic Projects in California)

Nevada Systems in Noncompliance with Arsenic

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order ⁴ (Y/N)	Status
1	NV0000149	Desert Paradise MHP	Clark	70	16	Y	Bottled water is being provided. Anticipated return to compliance date is unknown.
2	NV0000298	LaMoille Valley Plaza	Elko	25	23	N	State issued a Notice of Formal Enforcement in April 2016. Anticipated return to compliance date is unknown. POUs installed, but not tested. Private company may purchase this system.
3	NV0000319	Roark Estates Water Assoc	Clark	62	26	N	State issued a Notice of Formal Enforcement in April 2016. SRF- funded POU treatment installation completed in August 2016. Return to compliance anticipated in September 2016.
4	NV0005028	Shoshone Estates Water Co. Inc.	Nye	240	30	N	State issued a Notice of Formal Enforcement in April 2016.

⁴ Unless stated otherwise, the state primacy agency issued the enforcement order.

Nevada Systems in Noncompliance with Arsenic

(Based on information reported by the state through June 2016)

MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ppb)	Under Order ⁴ (Y/N)	Status
							Board has been responsive and POUs are planned. Anticipated return to compliance date is unknown.
5	NV0000058	Wildes Manor	Churchill	70	17	Υ	Bottled water is being provided. Anticipated return to compliance date is unknown.
6	NV0004012	Silver Knolls Mutual Water Co	Washoe	120	11	Y	Treatment installed. Awaiting additional sampling events to determine whether system meets RAA requirements.
7	NV0000147	Frontier Village	Clark	60	9	Y	Notice of formal enforcement in June 2016. Treatment was installed. Awaiting final confirmation from state that system is in full compliance.
8	NV0000303	Old River	Churchill	300	35	Y	POUs installed at all connections. Awaiting additional sampling events to determine whether system meets RAA requirements. Anticipated return to compliance is December 2016.
	Total	8		947			

Navajo Water Systems in Noncompliance with Arsenic

(Based on information reported by Navajo Nation EPA through June 2016) MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ppb)	Under Order⁵ (Y/N)	Status
1	NN3503028	Toadlena - NTUA	San Juan County, New Mexico	914	15	Υ	Anticipated return to compliance date is December 2017. Toadlena plans to blend with Narbona Pass water system (PWS ID NN-350301). Physical intertie completed. System awaits installation of 3-phase power.
2	NN4900220	Aneth - NTUA	San Juan County, Utah	1,297	10	Υ	Anticipated return to compliance date is June 2018. NTUA to construct arsenic treatment plant. NTUA applied to USDA for approximately \$1.9M for treatment system.
3	NN4903018	Montezuma Creek - NTUA	San Juan County, Utah	414	23	Υ	Anticipated return to compliance date is June 2018. NTUA to construct arsenic treatment

 $^{^{\}rm 5}$ Unless stated otherwise, the Navajo primacy agency issued the enforcement order.

Navajo Water Systems in Noncompliance with Arsenic

(Based on information reported by Navajo Nation EPA through June 2016) MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	County	Рор	Arsenic RAA (ppb)	Under Order⁵ (Y/N)	Status
							plant. Has applied to USDA for approximately \$1.9M for treatment system.
	Total	3		2,625			

Tribal DI Water Systems in Noncompliance with Arsenic

(Based on information reported by the Tribe and/or public water system through June 2016) MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	Tribe Name	Рор	Arsenic RAA (ppb)	Under Order ⁶ (Y/N)	Status
1	090400106	Polacca	Норі	2,600	17	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
2	090400107	Sipaulovi (Lower Sipaulovi/Lower Mishongnovi)	Норі	523	17	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
3	090400218	San Miguel CBP	Tohono Oʻodham Nation	113	11	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
4	090400237	SCUA Soda Canyon	San Carlos Apache	185	65	Y	Alternative water to be served at system. Anticipated return to compliance date is September 2018.
5	090400259	Shungopavi	Норі	1,500	13	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
6	090400260	Hopi Cultural Center	Норі	325	12	Y	Anticipated return to compliance date is 2020. The Tribe plans to install a point of entry system as an interim compliance measure. Bottled water is being served.
7	090400394	Mishongnovi (Upper Sipaulovi/ Upper Mishongnovi)	Норі	450	17	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
8	090400662	BIA San Carlos Forestry	San Carlos Apache	50	15	N	Anticipated return to compliance date is unknown. System under enforcement review by EPA.
9	090403011	Dzil Libei (Cameron) Elementary School	Navajo	133	40	N	Anticipated return to compliance date is unknown. Bottled water is being served. System under enforcement review by EPA.
10	090400395	Hopi High School - BIA	Hopi	1,150	9	Y	Anticipated return to compliance date is September

 $^{^6\}mbox{The US}$ Environmental Protection Agency issued the enforcement order.

Tribal DI Water Systems in Noncompliance with Arsenic

(Based on information reported by the Tribe and/or public water system through June 2016) MCL for Arsenic: 10 ppb

#	PWS ID	PWS Name	Tribe Name	Pop	Arsenic RAA (ppb)	Under Order ⁶ (Y/N)	Status
							2017. Awaiting additional sampling to confirm compliance. The system is currently serving compliant water.
	Total	10		7,079			

Attachment B

	Region 9 Arsenic Small System Enforcement Actions as of August 2016									
System	City, State	Population	Arsenic level at the time of the enforcement action (ppb)	Enforcement action (NOV, AOC, Order) and date	Interim measures	Date system should meet the MCL				
Hopi Cultural Center	Hopi Tribe	25, Hotel, café, Non- Comm. system	12	AOC August 16, 2016	POU/POE by March 2017, bottled water is currently available.	June 2020				
Hopi High School, BIA	Hopi Tribe	1,150	9	AOC September 2009	Currently serving compliant water.	December 2016				
Torres Martinez	Torres- Martinez Tribe	266	14	AOC March 26, 2015	Returned to compliance (RTC) in 2015.	RTC in 2015, Consolidation				
Pioneertown	Pioneertown, CA	377	108	AOC July 28, 2016	Bottled water is currently available.	June 2019				

Attachment C

	Drin	king Wate	r State Revolvin	g Fund Arsenic Project	s in California as of	August 2016
	PWS ID	Cross Ref	PWS Name	Project Description	Total Commitment	Milestone
1	CA1500426	APP: 1 ATCH: A Row: 17	Rosa Villa Apartments	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	Complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
2	CA1500485	APP: 1 ATCH: A Row: 24	Antelope Valley Mobile Estates	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	Complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
3	CA1500571	APP: 1 ATCH: A Row: 28	Lucky 18 on Rosamond, LLC	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	Complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
4	CA1502231	APP: 1 ATCH: A Row: 133	Rosamond School Water System	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
5	CA1502569	APP: 1 ATCH: A Row: 31	First Mutual Water System	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	Complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
6	CA1502744	APP: 1 ATCH: A Row: 34	60th Street Association Water System	Consolidation with Rosamond CSD (CA1510018)	DWSRF/Prop 84 Total: \$1.5M	Complete Plan & Design by 12/31/16. Pending review of environmental documents and engineering drawings.
7	CA5010008	APP: 1 ATCH: A Row: 117	City of Hughson	New arsenic treatment, new storage and distribution facilities.	SDWSRF and/or Prop 1 Total Cost: \$6.6M	Funding agreement to be issued early 2017.
8	CA5010009	APP: 1 ATCH: A Row: 118	Keyes CSD	New arsenic treatment plant + consolidation of 3 small arsenic impacted systems and 1 small nitrate impacted system (Faith Home Teen Ranch (CA5000217)).	DWSRF /Prop 1 Total: \$18.8M	Construction funding agreement to be issued (TBD) Project completion: 2018
9	CA5000086	APP: 1 ATCH: A Row: 109	Countryside Mobile Home Estates	Consolidation with Keyes CSD		
10	CA5000085	APP: 1 ATCH: A Row: 108	Green Run Mobile Estates	Consolidation with Keyes CSD		

11	CA5000051	APP: 1 ATCH: A Row: 106	Mobile Plaza Mobile Home Park	Consolidation with Keyes CD		
12	CA5210003	APP: 1 ATCH: A Row: 122	Los Molinos Comm. Services Dist.	Project for new well source and transmission line to consolidation New Orchard MHP (CA5200550) and Millstream MHP (CA5201137).	DWSRF Total Cost: 1.4M	Construction funding agreement to be issued by December 2016.
	Total	12				

Attachment A

Region 9 Public Drinking Water System File Review Protocol

(version 10/13/2016)

Objective

To determine whether the primacy agency for the Public Water System Supervision (PWSS) Program is making proper rule compliance determinations and reporting water system inventory and compliance data accurately to the EPA for making appropriate decisions to protect public health.

Background

File reviews generally accompany a comprehensive *program review*, where EPA evaluates the performance of primacy agency PWSS program management and implementation to include program administration, development, technical assistance and training, enforcement, and data management. However, EPA may choose to conduct standalone file reviews as a primacy agency oversight tool.

The Safe Drinking Water Act requires primacy agencies to report required public water system (PWS) information to EPA each quarter. EPA maintains the information in the national Safe Drinking Water Information System (SDWIS) database. SDWIS includes inventory information for each public water system (name, population served, system type, source characteristics) and violation information (failures to follow monitoring and reporting schedules, meet mandated treatment techniques or MCLs, or notify consumers, and related enforcement information).

File Review Process

Identify PWSs

Stratified random sample set or targeted sample set

Review files

Compare information in water system files against pre-populated EPA regional data capture forms with data retrieved from SDWIS

Document findings

Identify type of data discrepancies (inventory/compliance)

Categorize type of discrepancies

- Inaccurate (inventory only): system-specific inventory information not recorded accurately in the primacy agency database.
- Compliance determination under-reporting: Primacy agency or EPA determines a water system to be in violation but the violation is not recorded in the primacy agency database
- Compliance determination over-reporting: a water system file shows no valid violation yet a violation is recorded in the primacy agency database.
- Data flow: federally required data recorded in primacy agency database does not migrate successfully to SDWIS/Fed

Prepare report

Document, evaluate and assess findings. Provide EPA recommended actions. Work with primacy agency to address file review findings and prioritize EPA recommended actions for follow up in a program improvement plan.

Attachment B

- Action Level for Lead is 15 ppb.
- Lead levels greater than 15 ppb at the 90th percentile = Lead Action Level Exceedance (ALE)
- The lead Action Level is not the same as a Maximum Contaminant Level (MCL). Exceeding the AL required follow-up actions.

	Arizona Small PWSs with current ALEs for Lead (school PWSs in bold) (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)										
#	PWS ID	PWS Name	Pb90 mg/L	Pop	County	Status					
1	AZ0402112	Naco WC-Bisbee	0.0047	201	Cochise	Expect Pb90 <al 2017.="" 3="" 31="" 6-month="" and="" be="" completed="" done.<="" monitoring="" partial="" pb90<al.="" posted="" reports="" sampling="" state="" td="" to="" wqp=""></al>					
2	AZ0404869	USDS TNF Grapevine Campground	.04	30	Gila	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-month="" await="" be="" done.<="" monitoring="" of="" partial="" pb90<al.="" posted="" reports="" round="" sampling,="" second="" state="" td="" to="" wqp=""></al>					
3	AZ0409013	Porter Creek DWID	.07	300	Navajo	Expect Pb90<al b="" be="" posted<="" to=""> 3/31/2017. Await second round of 6-month sampling, 1st round Pb90<al. done.<="" monitoring="" partial="" reports="" state="" td="" wqp=""></al.></al>					
4	AZ0410093	Sandario Water Co.	.023	1062	Pima	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-month="" <="" al.<="" await="" be="" of="" pb90="" posted="" round="" sampling,="" second="" td="" to=""></al>					
5	AZ0411328	Copper Mtn Ranch	0.0164	909	Pinal	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-month="" await="" be="" of="" pb90<al.<="" posted="" round="" sampling,="" second="" td="" to=""></al>					
6	AZ0412306	Mtn view Campground	0.024	145	Santa Cruz	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-="" await="" be="" done.<="" monitoring="" month="" nd.="" of="" partial="" pb90="" posted="" reports="" round="" sampling,="" second="" state="" td="" to="" wqp=""></al>					
7	AZ0413108	Sedona Venture Water Co.	0.0654	700	Yavapai	Expect Pb90 <al 1<sup="" 2017.="" 3="" 31="" 6-="" await="" be="" month="" of="" posted="" round="" sampling,="" second="" to="">st round Pb90<al. completed.<="" monitoring="" td="" wqp=""></al.></al>					
8	AZ0414009	Valley Vista Water	0.0154	300	Yuma	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-="" await="" be="" done.<="" monitoring="" month="" of="" partial="" pb90<al.="" posted="" round="" sampling,="" second="" td="" to="" wqp=""></al>					
9	AZ0414448	Sunset MHP	0.0261	43	Yuma	Expect Pb90 <al 1st="" 2017.="" 3="" 31="" 6-="" await="" be="" done.<="" monitoring="" month="" of="" partial="" pb90<al.="" posted="" round="" sampling,="" second="" td="" to="" wqp=""></al>					

10	AZ0415120	Parker South	0.1	45	La Paz	Expect Pb90 <al be="" posted<="" th="" to=""></al>
10	7.20413120	Tarker south	0.1	43	Laraz	3/31/2017. Await second round of 6-
						month sampling, 1st round Pb90 <al.< td=""></al.<>
11	AZ0407072	Taliesin West	ND	85	Maricopa	Below Pb90 AL. Two 6-month
11	A20407072	Tallesili West	ND	65	Maricopa	sampling completed Pb90 <al.< td=""></al.<>
12	AZ0407900	Sontel Trust Water	ND	80	Maricopa	Below Pb90 AL. PWS had ALE in 2013
12	A20407300	Co-op	IND	60	Iviaricopa	but normal 2014 sampling was zero
13	AZ0409046	Holbrook SDA Indian		109	Navajo	PWS to complete a CCT study via third-
13	AZ0403040	School		109	Ivavajo	party TA contractor.
		301001				PWS has posted signs to flush
						water/fountains and sinks that have
						elevated lead.
14	AZ0413095	Oak Creek Elementary		250	Yavapai	School on bottled water for past 2
14	AZ0413093	Oak Creek Liementary		230	ravapai	years.
						PWS to complete a CCT study via third-
						party TA contractor.
						School plans to re-plumb building.
15	AZ0414105	Orange Grove		425	Yuma	PWS to complete a CCT study via third-
13	A20414103	Elementary		723	Tuma	party TA contractor.
		Licincinary				PWS has shut off water to classrooms
						and ordered filters. Custodians and/or
						teachers flush the water system prior
						to students' arrival.
16	AZ0407178	Paloma School		125	Maricopa	School on bottled water during
		District 94				Treatment Plant failure, no potable
						water was delivered to school and all
						sampling was suspended.
						CCT project has been approved by
						ADEQ in 2013.
						1st round of 6-month Pb90 results =
						0.0018 mg/L
	Total	16		4,809		C,

California Small PWSs with current ALEs for Lead (school PWSs in bold)

(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pb90	Pop	Status
1	CA0707573	DELTA MUTUAL WATER COMPANY	Contra Costa	0.009	225	Below Pb90 AL. Data transmission error. 9/21/2016 Triennial monitoring result PB90 = 0.009 mg/L.
2	CA1000324	Manning Gardens Care Center Inc.	Fresno	0.004	144	Farliest possible to be resolved 7/1/2017. PWS placed on six-month monitoring. 8/30/2016 6M monitoring result PB90 = 0.004 mg/L.
3	CA1500465	Oak Knolls Mutual Water Co	Kern	0.02	135	Earliest possible PB <al 2016="" 2017.="" 28="" 30="" 6="" 6m="" 9="" a="" ale="" as="" be="" following="" is="" monitoring="" now<="" pb90="0.02mg/L." pb90<al,="" posted="" pws="" result="" second="" td="" the="" this="" to=""></al>

						required to determine, install, and maintain OCCT. Many homes not occupied by the year round residents.
4	CA2000659	CBUSO Mission Bell	Madera	0.000	440	Earliest possible to be resolved 1/1/2017. System sampled on June 9, 2016 and all sample results were below the AL. They are scheduled to complete a second round before December 31st, 2016. The System completed Public Education (PE) and is on the path to full compliance. EPA has expressed concerns that the sample locations were not drinking water faucets.
5	CA2000681	Certainteed	Madera	0.033	150	Earliest possible PB <al 1="" 2016="" 2017.="" be="" changed="" consumers="" exceedance.<="" faucet="" fixtures.="" in="" june="" l.="" lead="" mg="" monitoring.="" not="" notified="" of="" out="" pb90="0.033" posted="" result="" returned="" sampling="" standard="" system="" td="" the="" to=""></al>
6	CA2000865	MD#58 Sierra Highland	Madera	0.0016	75	Farliest possible to be resolved 7/1/2017. System sampled on 8/17/16 results PB90 = 0.0016. Await next round of samples within 6 months.
7	CA4901144	Cohn Winery	Sonoma	0.000	55	Earliest possible to be resolved 7/1/2017. ALE on 1/26/2016. 1st round collected 7/30/2016 results PB90 = ND.
8	CA4901345	Buckley Family Partnership	Sonoma	0.000	45	Earliest possible to be resolved 1/1/2017. ALE on 12/22/215. 6M collected on 6/24/2016 results PB90 = ND
9	CA5200525	North Valley Services	Tehama	0.012	30	Below Pb90 AL. Data transmission error. Pb90 is 12.4ug/L.
10	CA5402050	Milk Specialties Global	Tulare	0.000	60	Farliest possible to be resolved 7/1/2017. Bottled water being provided. 6M samples collected 8/4/2016 results PB 90 = ND.
11	CA1900750	Del Sur School/Westside Union District	Los Angeles	0.014	920	Farliest possible to be resolved 7/1/2017. Not on bottled water. 6M1ST 2016 was an ALE 0.022 mg/L. 6M2ND 2016 was <al 0.014mg="" at="" l.<="" td=""></al>
12	CA4300779	Lakeside SD-Lakeside School	Santa Clara	0.041	110	School on bottled water. Corrosion control study due 3/2017.
13	CA5000116	Roselawn High	Stanislaus	0.03	223	Not on bottled water. State compliance order to be issued.

14	CA5400795	Waukena Elementary School	Tulare	0.012	230	School on bottled water. Taps locked. System pursuing new source due to nitrate and uranium. 9/29/2016 monitoring result PB 90 = 0.012 mg/L
15	CA5601405	Santa Clara School	Ventura	0.555	59	School on bottled water. ALE in 1998 - 0.555. Old school with lead pipes. On annual monitoring. Lead pipes mainly used for hand-washing.
16	CA5800845	MJUSD Dobbins School	Yuba	0.016	85	Not on bottled water. System under state compliance order. Most recent 90th percentile is 0.0157. Recommend File Review
17	CA5800847	MJUSD Loma Rica School	yuba	0.023	150	Not on bottled water. 9/14/2015 ALE = 0.023. Three other ALEs since 2004.
	Total	17			3,136	

	Nevada Small PWSs with current ALEs for Lead (school PWSs in bold) (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)								
#	PWS ID	PWS Name	County	Pop	Status				
1	NV0001103	Marigold Mine Potable Water System	Humboldt	300	Expect Pb90 <al (5="" 2016)="14" 2016.="" 2017.="" 3="" 31="" 5="" al="" be="" conducted.="" expect="" galvanized="" in="" initial="" march="" meet="" next="" off="" piping="" posted="" ppb.="" recent="" replaced="" sampling="" sampling.<="" shut="" td="" to="" valves="" with="" wqp=""></al>				
2	NV0001045	Goodsprings School	Clark	300	Not on bottled water. Fountains have been locked. Recent sampling (4/28/16) showed lead <al 13.6="" al="" at="" expect="" faucet="" investigating="" meet="" next="" ppb.="" replacements.="" sampling.<="" th="" to="" with=""></al>				
	Total	2		600					

	Northern Mariana Island Small PWSs with current ALEs for Lead (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)							
#	PWS ID	PWS Name	County	Pop	Status			
1	MP	Anaks Condominium		191	Expect Pb90 <al 2="" 2016="" 2017.="" 3="" 31="" al="" al.<="" be="" below="" does="" first="" have="" in="" july="" not="" posted="" pws="" sample="" samples="" six-month="" taken="" td="" to="" was="" yet.=""></al>			
2	MP	Aqua Resort Hotel		514	Expect Pb90 <al 2="" 2016="" 2017.="" 3="" 31="" al="" al.<="" be="" below="" does="" first="" have="" in="" july="" not="" posted="" pws="" sample="" samples="" six-month="" taken="" td="" to="" was="" yet.=""></al>			

3	MP	Hyatt Hotel Staff Housing	77	Expect Pb90 <al 1st="" 2013.="" 2016="" 2017.="" 3="" 31="" 6-month="" agency="" al.<="" ale="" aug.="" back="" be="" below="" compliance="" dec.="" in="" july="" monitoring.="" on="" overlooked="" posted="" primacy="" putting="" pws="" sample="" th="" to="" took="" was="" which=""></al>
4	MP	Finasisu Terrace Apartment/Tan Holdings	393	Below Pb90 AL. ALE in 2011. Below AL in 2013. Monitoring for two consecutive 6-month periods in 2014 showed levels below AL.
	Total	4	1,175	

	Tribal DI Small PWSs with current ALEs for Lead (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)								
#	PWS ID	PWS Name	Tribe Name	Pop	Status				
1	09- 0402057	Kitt Peak National Observatory	Tohono Oʻodham Nation	80	Conducting CCT study				
2	09- 0605158	Camp Casino (Golden Acorn Casino)	Campo	1000	Changed out fixtures, still above AL; CCT now installed and monitoring is ongoing				
3	09- 0605164	Big Valley Rancheria Water District	Big Valley Band	3135	Conducting CCT study with FY16 DWTSA funds				
4	09- 0605128	Round Valley Administration Complex	Covelo Indian Community	100	CCT deemed optimized				
5	09- 3200161	Washoe Tribe Carson Colony	Washoe	450	On increased monitoring				
	Total	5		4,765					

Attachment C

- Action Level for Lead is 15 ppb.
- Lead levels greater than 15 ppb at the 90th percentile = Lead Action Level Exceedance (ALE)
- The lead action level is not the same as a Maximum Contaminant Level (MCL). Exceeding the AL required follow-up actions.

Arizona Small PWSs with Historical Lead ALEs (not current ALEs) as of June 2016								
#	PWS ID	PWS Name	Population	County	No. of historical multiple ALEs or 2 consecutive ALEs over the past 7 years			
1	AZ0411705	ADOC Eyman Unit	5,100	Pinal	2			
2	AZ0410092	Marana Municipal – Picture Rocks	4,763	Pima	2			

3	AZ0413108	Sedona Venture Water Company	700	Yavapai	2
4	AZ0414009	Valley Vista Water Company	300	Yuma	2
5	AZ0412306	Mountain View Campground	145	Santa Cruz	2
6	AZ0402112	Naco Water Co – Bisbee	201	Cochise	2
7	AZ0404037	Town of Star Valley Water Department	1,107	Gila	2
8	AZ0415096	Q Mountain Water Company	1,292	La Paz	2
9	AZ0410264	THIM Water Corp 2	450	Pima	2
10	AZ0409013	Porter Creek DWID	300	Navajo	2
11	AZ0415120	Parker South	45	La Paz	2
12	AZ0410207	THIM Utility Corporation - VFW	528	Pima	2
13	AZ0402063	Cochise Jr College	1,210	Cochise	2
14	AZ0414105	Orange Grove Elementary School	425	Yuma	2
15	AZ0413095	Oak Creek Elementary School	250	Yavapai	2
16	AZ0409046	Holbrook SDA Indian School	109	Navajo	2

	California Small PWSs with Historical Lead ALEs (not current ALEs) as of June 2016								
#	PWS ID	PWS Name	Population	County	No. of historical multiple ALEs or 2 consecutive ALEs over the past 12 years				
1	CA2300644	Woodside RV Park	280	Mendocino	3+				
2	CA3610026	SBDNO County Service Area 70 Cedar Glen	1013	San Bernardino	3+				
3	CA3710707	USN San Clemente Island	442	San Diego	3+				
4	CA4200854	Imerys Minerals California Inc.	600	Santa Barbara	3+				
5	CA4900508	Cazadero Water Company, Inc.	250	Sonoma	2 consecutive				
6	CA5400701	Sequoia Crest Water Company	29 4	Tulare	3+				
7	CA5400934	Ponderosa CSD	280	Tulare	3+				
8	CA1010501	NPS-Grant Grove – Fresno District (23)	50	Fresno	2 consecutive				
9	CA4300779	Lakeside SD-Lakeside School	110	Santa Clara	3+				
10	CA5400624	Kings River Elementary School	600	Tulare	3+				
11	CA5400795	Waukena Elementary School	230	Tulare	3+				
12	CA1000112	Fairmont School	483	Fresno	3+				
13	CA1000276	Orange Center School	410	Fresno	3+				
14	CA1000315	Clay Joint Elementary School	263	Fresno	3+				
15	CA5800843	MJSUD Foothill Intermediate School	325	Yuba	3+				
16	CA5800845	MJUSD Dobbins School	85	Yuba	3+				
17	CA5800847	MJUSD Loma Rica School	150	Yuba	3+				